

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,  
MARY BLY, MICHAEL CONNELLY, SYLVIA  
DAY, JONATHAN FRANZEN, JOHN  
GRISHAM, ELIN HILDERBRAND,  
CHRISTINA BAKER KLINE, MAYA  
SHANBHAG LANG, VICTOR LAVALLE,  
GEORGE R.R. MARTIN, JODI PICOULT,  
DOUGLAS PRESTON, ROXANA ROBINSON,  
GEORGE SAUNDERS, SCOTT TUROW, and  
RACHEL VAIL, individually and on behalf of  
others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC,  
OPENAI GP LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI CORPORATION  
LLC, OPENAI HOLDINGS LLC, OPENAI  
STARTUP FUND I LP, OPENAI STARTUP  
FUND GP I LLC, and OPENAI STARTUP  
FUND MANAGEMENT LLC,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR  
BRANCH, RICH COHEN, EUGENE LINDEN,  
DANIEL OKRENT, JULIAN SANCTON,  
HAMPTON SIDES, STACY SCHIFF, JAMES  
SHAPIRO, JIA TOLENTINO, and SIMON  
WINCHESTER, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI GP, LLC, OPENAI,  
LLC, OPENAI OPCO LLC, OPENAI GLOBAL  
LLC, OAI CORPORATION, LLC, OPENAI  
HOLDINGS, LLC, and MICROSOFT  
CORPORATION,

Defendants.

Case No.: 1:23-cv-08292-SHS

Case No.: 1:23-cv-10211-SHS

Case No.: 1:24-cv-00084-SHS

Hon. Sidney H. Stein

**[PROPOSED] ORDER GRANTING  
MOTION TO ADMIT COUNSEL *PRO*  
*HAC VICE***

NICHOLAS A. BASBANES and NICHOLAS  
NGAGOYEANES (professionally known as  
Nicholas Gage), individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

MICROSOFT CORPORATION,  
OPENAI, INC., OPENAI GP, LLC,  
OPENAI HOLDINGS, LLC, OAI  
CORPORATION, LLC, OPENAI  
GLOBAL, LLC, OPENAI, LLC, and  
OPENAI OPCO LLC,

Defendants.

The motion of Edward A. Bayley, for admission to practice *Pro Hac Vice* in the above captioned action is granted.

Applicant has declared that he is a member in good standing of the bar of the State of California; and that his contact information is as follows:

Edward A. Bayley  
Keker, Van Nest & Peters LLP  
633 Battery Street  
San Francisco, CA 94111-1809  
Telephone: 415-391-5400  
Facsimile: 415-397-7188  
Email: ebayley@keker.com

Applicant having requested admission *Pro Hac Vice* to appear for all purposes as counsel for Defendants OpenAI Inc., OpenAI LP, OpenAI LLC, OpenAI GP LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, OpenAI Holdings LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, and OpenAI Startup Fund Management LLC in the above-entitled action:

**IT IS HEREBY ORDERED** that Applicant is admitted to practice *Pro Hac Vice* in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Sidney H. Stein  
United States District Judge